

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Camille Wilson,) Civil Action No. 1:16-cv-00114-DAP

Plaintiff,) Honorable Judge Dan Aaron Polster

v.)

University Hospitals Case Medical Center)
Defendant,) Honorable Judge Dan Aaron Polster Orders
)
 Plaintiff Motions
)
 Plaintiff Phone Records and Emails
)
 Defendant Report of Findings to Judge Poster's
)
 Appointed Investigation

(1) During our phone conference with Honorable Judge Dan Aaron Polster on January 28, 2016, the Honorable Judge Dan Aaron Polster asked David Campbell, Counsel for the defendant University Hospitals Case Medical Center to make sure that he gives to Plaintiff all the information concerning UH Hospital's Reduction in Force (RIF). Several times, Plaintiff have asked defendant Mr. Campbell for the information concerning the RIF's three-person panel, which persons included Plaintiff supervisor of UH Hospital defendant Kathleen Deakins's, defendant supervisor, UH Hospital defendant Paula Gillette, VP of Nursing and Patient Care Services and UH Hospital defendant Kathleen Deakins's manager UH Hospital defendant Patti De Pompei, President of Rainbow Babies & Children's Hospital.

(2) Plaintiff have attached copies of the emails that defendant Counsel Mr. Campbell and Plaintiff have exchanged to show the courts proof of Plaintiff's requests to defendant Counsel Mr. Campbell. Defendant Counsel Mr. Campbell's position with not complying with the courts has force Plaintiff to bring this issue before the courts. This specific information concerning the

three-person panel RIF has a sufficient and critical relevance that supports Plaintiff's case which facts exposing retaliation and Plaintiff does take this case seriously.

(3) Alongside the Plaintiff motion to the court of the Honorable Judge Dan Aaron Polster for An Appointed Counsel, at the conference meeting on February 26, 2016 due to the Plaintiff's lack of knowledge and understanding governing the Laws of the courts.

(4) Plaintiff would like to motion the courts to address the defendant Counsel David Campbell concerning releasing the RIF information concerning the three-person panel's discussion making process, that Plaintiff have repeatedly asked defendant Counsel David Campbell for.

(5) Honorable Judge Dan Aaron Polster also made it very clear while on the phone during our phone conference. "He was going to look into the information that Plaintiff had shared with all of the parties while on the phone concerning Plaintiff being placed on the defendant UH Hospital's "Do Not Rehire List" Honorable Judge Polster then went on to say that if he found out that the plaintiff's information was true then this case would be more than just a RIF issue.

(6) Defendant UH Hospital out-reaches' coordinator Andrea Shadd whose name Plaintiff had given to Honorable Judge Polster when Honorable Judge Poster asked to whom Plaintiff talked with. Defendant of UH Hospital Ms. Shadd let Plaintiff know during their conversation that the defendant UH Hospital has a do not rehire list and if defendant of UH Hospital Ms. Shadd did not call Plaintiff back then that meant Plaintiff's name was on that list and Plaintiff did not receive any call back for defendant UH Hospital out-reaches coordinator Ms Shadd. Plaintiff has given this same statement to the OCRC.

(7) Defendant Counsel David Campbell reported to the Honorable Judge Dan Aaron Polster and all parties present for the conference meeting on February 26, 2016 (Plaintiff present, defendants of UH Hospital Counsel David Campbell, Liana Hollingsworth, and Marcie Manson that Andrea Shadd the out-reach coordinator for defendant UH Hospital has now denied speaking with Plaintiff at all on the phone

during defendant Counsel David Campbell for UH Hospitals investigation. Defendant of UH Hospital Mr. Campbell informed Plaintiff that the Honorable Judge Dan Aaron had appointed defendant Counsel Mr. Campbell to investigate Plaintiff's allegations after Plaintiff had send defendant Counsel Mr. Campbell an email concerning questions about the RIF's three-person panel. Plaintiff felt that defendant's had been giving a second chance to redeem some character of honesty from the Honorable Judge Dan Aaron merciful actions. Plaintiff also felt that the Honorable Judge Dan Aaron Polster would appreciate if there were additional, specific action taken inconsideration during Defendant Counsel Mr. Campbell's investigation that would produce some proof of evidence and facts supporting the time and efforts that was put toward defendant's investigation and the defendant findings during his presentation to the Honorable Judge Dan Aaron Polster.

(8) Plaintiff have attached a certified copy of Plaintiff phone records from the Sprint Records Department with proof showing probable cause to the fact that a phone conversation between the two the Plaintiff and defendant UH Hospital's out-reach coordinator Andrea Shadd did indeed take place and a copy of the positions, which Plaintiff applied for at UH Hospital after being Laid off with supposedly preferential jobs posting privileges. The defendant's evidently are not capable of telling the true and Plaintiff's evidence clearly shows that the defendant's allegations to the courts are entirely false.

(9) The defendant's false allegations is a perfect cause to reasons to why the Honorable Judge Dan Aaron Polster needs to make a serious measurable note of the defendant's dishonesty, which has discredited the defendant's accreditability with the courts.

Camille Wilson 3-10-2016

Camille Wilson

16327 Delrey Ave

Cleveland, Ohio 44128

216 965-5570



Sprint
Amy Ware
Corporate Security, Subpoena Specialist
Mailstop KSOPHM0206
6480 Sprint Parkway
Overland Park, KS 66251
Phone: 913-315-4487 Fax: 816-600-3161
Email: Amy.2.Ware@sprint.com
Toll Free: 800-877-7330

03/04/2016

Camille Wilson
16327 Delrey Ave
Cleveland, OH 44128

Sprint Case Number: 2016-047297
Your Referenced Case Number: 116CV00114DAP

Dear Camille Wilson,

Pursuant to the above-referenced case, I am enclosing records for the requested time period associated with the following:

Request Type: CDR

Date Range: 08/26/2014 to 02/26/2016

Subject Number: 216-965-5570

Subscriber Name: Camille Wilson

Comments:

Please see the attached documents. Please note records were researched for the complete date range listed above. However, records were found only from 12/30/2014 to 1/31/2015.

No additional records were found for this number. It appears this number was serviced by T-Mobile during the requested time period.

Please be advised, Sprint does not retain PictureMail, Email or Text content.

Please use the contact information listed above for any questions or further inquiries regarding this request.

Sincerely,

Amy Ware
Subpoena Compliance
Sprint Corporate Security

Enclosures

*Notice: If the records contained in the attached package are utilized in trial proceedings, and if you require a records custodian for authentication, be advised Sprint does not have local representatives. Sprint's Trial Team is located at our Corporate Headquarters in Overland Park, Kansas. You will need to contact the Trial Team at CSTrialTeam@Sprint.com or call our office at 800-877-7330. Our office will require at least two-weeks notice in addition to pre-paid travel arrangements by your office.



Sprint
Corporate Security
Mailstop KSOPHM0206
6480 Sprint Parkway
Overland Park, KS 66251
Office: 800-877-7330 Fax: 816-600-3111

Key to Understanding CDMA Call Detail Reports

Calling number: This column reflects the number placing the call (the individual who initiated the call). If the call is an outgoing call, this will be the Sprint PCS target number.

Called number: This column reflects the number actually called. In most cases this number will be the same as the number in the "Dialed Digits" column. If the number has been forwarded, or if there is a routing number, then this will be reflected. If the number has a 11 in front of the area code, that means the call rolled to voicemail and was NOT answered by the customer.

Dialed digits: This column reflects the digits that the caller enters into the keypad of the phone. If the call is an incoming call, this will be the Sprint PCS target number.

Mobile Role: Mobile Role (Type of Call). Listed as outgoing, incoming, routed call or undetermined.

Start Date: Date and time the call was initiated.

End Date: Date and time the call was ended.

Duration: Duration of call, in seconds.

Call Type: Indicates the type of transaction on the network. This includes, but not limited

NEID: This reflects which network element handled the call.



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Corporate Security
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6480 Sprint Parkway
Overland Park, KS 66251
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Key to Understanding CDMA Call Detail Reports, cont.

*Routed calls come in several varieties. A TLDN (Temporary Local Directory Number) may be considered to be a bridge/router number to complete a call. Similar to TLDN, an IMRN (IP Multimedia Routing Number), will be used to route Apple WiFi Calls. Another scenario is when a call is not answered, but is routed to voicemail. Calls routed straight to voicemail may also have an "11" before the number indicated in the "Called_Nbr" column. For handsets using visual voicemail, these numbers may replace the "11" in the called number column: (800) 877-2400, (866) 677-8204, (866) 222-2604, and (877) 836-4746. The indicator that Sprint's Visual Voicemail platform was used within the session appears as 624500000XXXXXX.

*WiFi Call Type: Please note that Sprint does not have the capability to determine the time stamp. These calls can be reflected in Switch time or GMT.

*The CDMA call detail report may indicate the sending and receipt of text messages and e-mail. While not flagged as text messages, the line will indicate no duration, the dialed digits column will either be blank or will show an e-mail address, and the repoll column may contain one of the following numbers: 13; 291-298; 347; 506-533; 681-684; 686-688.

NEIDs 191-198 226-229 291-294

* On the CDMA network, Sprint maintains Gateway and SWAT (Soft Wireless Access Tandem) networks in areas where there are large Sprint customer populations. These provide the required extra space that helps Sprint maintain all of the calls. When a call moves through a gateway or SWAT cell site information is not retained and is not recoverable. NEIDs for Gateways 124-125, NEIDs for SWATs 96, 184-190, 263, 363-365

*Please be advised that as of October 12, 2010, all CDMA CDR (Call Detail Record) text message time stamps are kept in Central time zone. Records prior to October 12, 2010 are either in Central or Eastern time zone. Sprint is unable to determine which time zone is reflected in records older than October 12, 2010.

*Short codes, also known as short numbers, are special telephone codes, significantly shorter than full telephone numbers, which can also be used to address SMS and MMS messages from mobile phones or fixed phones. Short codes are often associated with automated services. An automated program can handle the response and typically requires the sender to start the message with a command word or prefix. A list of short codes is not maintained by Sprint as number of short codes is extensive and constantly growing. Example of a short code- the customer may want updates pertaining to their favorite sports team. The customer would sign up with that team in order to receive text message updates relevant to the team.



Sprint
Corporate Security
Mailstop KSOPHM0206
6480 Sprint Parkway
Overland Park, KS 66251
Office: 800-877-7330 Fax: 816-600-3111

Star Codes

Your request has been fulfilled, at least in part, by what is known as a CDMA CDR Report. A CDMA CDR Report lists information about incoming/outgoing calls including the digits dialed on the handset. As a dialing shortcut, PCS subscribers may use star codes (an asterisk (*) plus a short number sequence) when using our wireless telephones. On call detail reports the star may be indicated by a letter "B". This code will appear in the dialed digits column of the CDMA CDR Report. Following is a list of the most common star codes. Additional star codes may exist in the market from which the call is made. Please contact the Subpoena Compliance Group at the number listed above for more information concerning star codes.

- *18 - Ping the nearest tower, call delivery activate
- *180 - Call delivery deactivate
- *2 - Customer Care
- *3 - Payment Center
- *31 - Three Way Calling
- *4 - Account information
- *5 - Spanish Customer care
- *67 - Caller ID block
- *68 - Override caller ID block
- *70 - Cancel call waiting for that call
- *711 - Customer Care
- *72 - Activates call forwarding
- *720 - Deactivates call forwarding
- *73 - Call forwarding no answer
- *74 - Call forward busy
- *811 - Customer Care
- *82 - Override caller ID block- for that call
- *911 - 911
- *073 - Cancel call forward no answer
- *074 - Cancel call forward busy

Other numbers which may appear in the dialed digits column:

- 411 - Directory assistance
- 611 - Customer Care
- 711 - Telecommunications Relay Service (hearing impaired)
- 911 - Can also dial 0911 or 1911)
- c777 - Web Browsing (SINS)

03/04/2016 9:10 AM

Call Records For PTN 2169655570-1

18 of 25

CALLING_NBR	CALLED_NBR	Dialed_Digits	MOBILE_ROLE	START_DATE	END_DATE	DURATION (SEC)	Call Type	NEID
(216) 965-5570	(216) 991-3987	991-3987	Outbound	01/21/2015 19:16:27	01/21/2015 20:01:22	2695	Voice	426
(216) 965-5570	(216) 816-7851	(216) 816-7851	Outbound	01/21/2015 21:48:27	01/21/2015 21:49:53	86	Voice	426
(216) 965-5570	(216) 767-8379	B677678379	Outbound	01/22/2015 10:16:17	01/22/2015 10:18:03	106	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 10:27:14	01/22/2015 10:28:03	49	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 10:28:17	01/22/2015 10:28:24	7	Voice	426
(216) 965-5570	(216) 767-8349	767-8349	Outbound	01/22/2015 10:28:25	01/22/2015 10:30:20	115	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 10:33:13	01/22/2015 10:34:54	101	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 10:39:17	01/22/2015 10:43:31	254	Voice	426
(216) 965-5570	(216) 767-8356	B677678356	Outbound	01/22/2015 10:46:41	01/22/2015 10:48:47	126	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 10:49:44	01/22/2015 10:50:12	28	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 11:03:16	01/22/2015 11:05:37	141	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 11:14:14	01/22/2015 11:15:30	76	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 11:19:00	01/22/2015 11:19:00	0	Text Detail	192
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 11:32:05	01/22/2015 11:33:08	63	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 12:15:49	01/22/2015 12:36:04	1215	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 12:17:29	01/22/2015 12:18:32	63	Voice	140
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 12:17:53	01/22/2015 12:18:15	22	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 12:37:45	01/22/2015 12:38:52	67	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 12:59:17	01/22/2015 12:59:37	20	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 13:51:36	01/22/2015 13:52:18	42	Voice	140
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 13:52:05	01/22/2015 13:52:40	35	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 13:54:41	01/22/2015 14:36:51	70	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 14:57:01	01/22/2015 14:57:01	0	Text Detail	198
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 15:00:00	01/22/2015 15:00:00	0	Text Detail	192
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 15:01:54	01/22/2015 15:01:54	0	Text Detail	195
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 15:25:58	01/22/2015 15:25:58	0	Text Detail	192
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 15:27:03	01/22/2015 15:27:03	0	Text Detail	198
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 16:33:28	01/22/2015 16:33:28	0	Text Detail	197
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 16:36:56	01/22/2015 16:36:56	0	Text Detail	192
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 17:23:38	01/22/2015 17:23:44	6	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 17:23:58	01/22/2015 17:24:05	7	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 17:26:29	01/22/2015 17:26:30	1	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 17:26:38	01/22/2015 17:28:03	85	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 17:31:19	01/22/2015 17:31:49	30	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 17:36:58	01/22/2015 17:37:22	24	Voice	140
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 17:36:58	01/22/2015 17:37:22	24	Voice	140
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 17:37:28	01/22/2015 17:37:41	13	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Outbound	01/22/2015 17:37:57	01/22/2015 17:38:52	55	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 18:00:32	01/22/2015 18:01:03	31	Voice	140
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 18:01:01	01/22/2015 18:01:25	24	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 18:28:52	01/22/2015 18:29:40	48	Voice	140
(216) 965-5570	(216) 844-1000	B678441000	Inbound	01/22/2015 18:29:20	01/22/2015 18:30:02	42	Voice	426
(216) 965-5570	(216) 844-1000	B678441000	Routed_Call	01/22/2015 18:33:48	01/22/2015 18:34:28	40	Voice	140

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Camille Wilson
 Plaintiff
 v.
University Hospitals Case Medical Center
 Defendant

Civil Action No. 1:16-cv-00114-DAP

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Sprint records of phone logs for 18mths prior ALL In+Out Calls.
 FAX 816 600 3161 (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please release Camille Wilson 214 945-5570 phone log for In and Out calls All of them in the date span of 18months prior from today's date.
 Example (Sept 2014 → January 2015 → February 2016)

Place: (1) MSC WILSON 7 @ yahoo.com (2) Camille Wilson 16327 Delrey Ave Cleveland Ohio 44128	Date and Time: ASAP February 26, 2016
--	--

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 2/26/2016 **GERI M. SMITH, CLERK**

CLERK OF COURT

Stephanie Surr

Signature of Clerk or Deputy Clerk

OR

Camille Wilson

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) _____, who issues or requests this subpoena, are: _____

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Here is a copy of what I mean as far as the request Attorney Campbell was supposed to give to me concerning the RIF. (See the attached ORCR document I have included in this attachment. Still would like to have this requested information.

Why was Attorney Murray Richelson contacted from you r Law Office, concerning a settlement offer and having disclosure to my filing charges given to him, this information is in the OCRC document. I never authorize him as my attorney for this case? He did mention to me that UH violated (FMLA) policies once he had me on the phone.

UH has denied that they hired Private Investigators right?

May I have a copy of UH policy and procedures concerning (working relationships)? For example girlfriends, boyfriends, married couples (sex) or related family members working together in the same department on the same shifts?

May I have a copy of UH policy and procedures concerning the internal and external protection policy that the Reimbursement and Tuition Department has set in place for all UH employees who has accepted this benefit that clearly states that your supervisor (Kathy Deakins) is allowed to as she did enforce such protection policy for their own safety concerns, which she did call my college and she told me that this protection policy existence.

Number (11) other matter for the attention of the Court:

Should I include the same information that I put on the first form or is that supposed to be done separate? Reason I'm asking is because we do not go over question number 11.

Subject: RIF--Roles of the three panel's person and describe the decision-making process.

From: camille wilson (mscwilson1@yahoo.com)

To: dacampbell@vorys.com;

Date: Sunday, February 14, 2016 3:28 PM

Attorney Campbell,

Honorable Judge Dan Aaron Polster asked, that all the RIF information be given to me during our phone conference. I searched through the documents from the OCRC and could not locate the answers to specific question(s) concerning the RIF. Could you please make sure I receive this information concerning the RIF.

1. Define the roles of the three persons panel.
2. Describe the decision making process.

For example, did the panel's decision have to be unanimous? Majority vote? Could the senior member of the panel (Ms. DePompei) make a unilateral decision and override the positions of the two junior members?

Thanks you.

Regards,

Camille Wilson
(216) 965-5570

12/6/2015

(5918 unread) - mscwilson1 - Yahoo Mail



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Wilson v. University Hospitals (6)

People ★

Simpson, Sherron <Sherron.Simpson@civ.ohio.gov>

Mar 24 at 10:44 AM ★

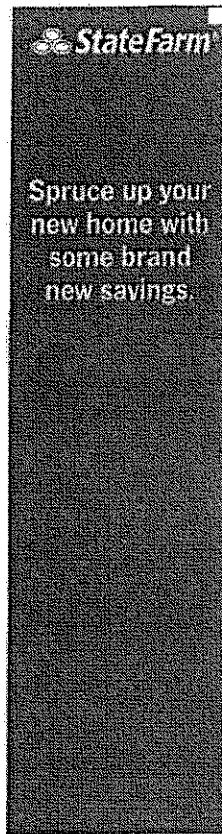
To: camille wilson

Hi Camille... I was out of the office yesterday, but I was going to contact you because I received an email from Respondent stating you retained an attorney and that you are planning to file a lawsuit. Respondent wanted to know if you intend to proceed with the investigation through OCRC as well? Respondent has yet to submit its position statement, but I believe Respondent might be waiting to see if you plan on continuing the investigation with OCRC.

I look forward to hearing from you soon.

For the Commission,

Sherron Simpson, Investigator
Cleveland Regional Office
Ohio Civil Rights Commission
615 W. Superior Avenue, Suite 885
Cleveland, Ohio 44113
216.787.3380 (direct)
216.787.3150 (main)
216.787.4121 (fax)
sherron.simpson@civ.ohio.gov
www.crc.ohio.gov



› Show original message

Reply, Reply All or Forward | More

Simpson, Sherron Hi Camille... I do not need any information from y

Mar 25 at 11:07 AM

camille wilson Sherron....Thank you for your reply and I do understa

Mar 25 at 6:30 PM

camille wilson <mscwilson1@yahoo.com>
To: camille wilson

Apr 2 at 6:19 PM

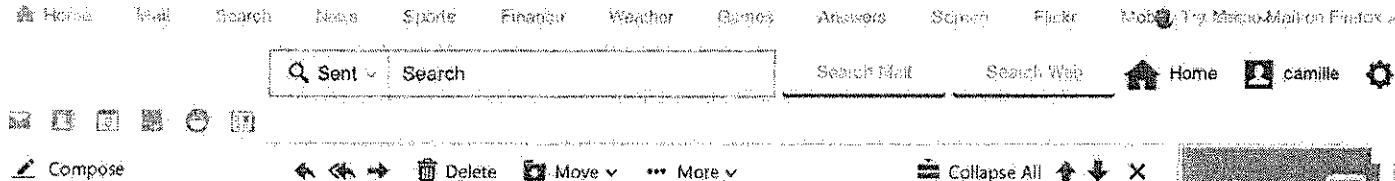
Sherron ---did University Hospitals send in their position statement or did you have to subpoena them? I just was curious.

Sincerely,
Camille Wilson

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12/6/2015

(5918 unread) - mscwilson1 - Yahoo Mail

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Wilson v. University Hospitals (6)

People

Simpson, Sherron Hi Camille... I was out of the office yesterday, but.

Mar 24 at 10:44 AM

Simpson, Sherron <Sherron.Simpson@civ.ohio.gov>

Mar 25 at 11:07 AM

To: camille.wilson

Hi Camille... I do not need any information from you at this time. I am just waiting for Respondent to submit its position statement. I have given Respondent several extensions and they still have not submitted a response. I informed Respondent's attorney this morning that a subpoena will be issued if Respondent's answer is not submitted by March 31, 2015. Once I receive the position statement, I will contact you so we can make an appointment for you to come into the office for a review.

If you have any more questions, please do not hesitate to contact me.

For the Commission,

Sherron Simpson, Investigator
Cleveland Regional Office
Ohio Civil Rights Commission
615 W. Superior Avenue, Suite 885
Cleveland, Ohio 44113
216.787.3380 (direct)
216.787.3150 (main)
216.787.4121 (fax)
sherron.simpson@civ.ohio.gov
www.crc.ohio.gov



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[Reply](#), [Reply All](#) or [Forward](#) | [More](#)**camille wilson** <mscwilson1@yahoo.com>

Mar 25 at 6:30 PM

To: camille.wilson

Sheron....Thank you for your reply and I do understand clearly what you have stated, therefore I will wait to here back from you when it's time for the review as you mentioned. I really appreciate your assistance.

Thanks,
Camille Wilson

On Wednesday, March 25, 2015 11:07 AM, "Simpson, Sherron" <Sherron.Simpson@civ.ohio.gov> wrote:

Hi Camille... I do not need any information from you at this time. I am just waiting for

12/6/2015

(5918 unread) - mscwilson1 - Yahoo Mail

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To camille wilson

Sherron ---did University Hospitals send in their position statement or did you have to subpoena them? I just was curious.

Sincerely,
Camille Wilson

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camille wilson <mscwilson1@yahoo.com> Apr 2 at 6:22 PM

To camille wilson

Sherron ---did University Hospitals send in their position statement or did you have to subpoena them? I just was curious.

Sincerely,
Camille Wilson

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camille wilson <mscwilson1@yahoo.com> Apr 8 at 8:14 PM

To Sherron Simpson

Sherron ---did University Hospitals send in their position statement or did you have to subpoena them? I just was curious.

Sincerely,
Camille Wilson

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camille wilson [camille.wilson1@yahoo.com](#) Mar 23 at 12:05 PM
To: katzco-jh@earthlink.net

Hi John,

Could you please ask attorney Murray to send me a copy of the settlement email he received from University Hospitals attorney. Thank you.

Best Regards,
Camille Wilson
mscwilson1@yahoo.com

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John Hickman Ms. Wilson, Please find attached a copy of the paper. Mar 24 at 9:19 AM

camille wilson [camille.wilson1@yahoo.com](#) Mar 24 at 7:22 PM
To: John Hickman

Hi John,

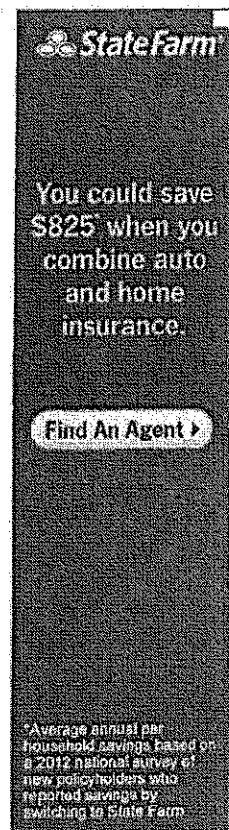
This is the wrong information please ask Murray to send me the recent email he received for University Hospitals attorney via his call to me on Wednesday March 18, 2015 concerning settlement. I left a message on his voice mailbox today as well. Thanks.

Camille Wilson
216 965-5570

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2140 LEE ROAD
SUITE 203
CLEVELAND HEIGHTS,
OHIO 44118

LOREN GORDON
ATTORNEY & COUNSELOR

(216) 861-5175

October 7, 2015

Ohio Civil Rights Commission
Compliance Department
30 East Broad Street, 5th Floor
Columbus, Ohio 43215

RE: Camille Wilson

To Whom it May Concern:

The Commission gave me Ms. Wilson's file last week. Ms. Wilson and I reviewed it. I am now writing to supplement my letter of October 2. I will address both the RIF and the underlying retaliation.

First, the Commission should look at the composition of the three-person panel that decided to include Ms. Wilson in the RIF. UH counsel David Campbell sent an e-mail to OCRC employee Ron Church on August 24, 2015 (copy attached). In that e-mail, Mr. Campbell identified the members of the panel as Patti DePompei, President of Rainbow Hospital; Paula Gillette, Vice President of Nursing; and Kathy Deakins, Ms. Wilson's immediate supervisor. UH did not define the roles of the three persons or describe the decision-making process. For example, did the panel's decision have to be unanimous? Majority vote? Could the senior member of the panel (Ms. DePompei) make a unilateral decision and override the positions of the two junior members? This is important because two members of the panel – Kathy Deakins and Ms. Gillette – knew of Ms. Wilson's protected conduct, and of course Ms. Deakins was a person that Ms. Wilson complained about. (Ms. Wilson also complained about Nancy Johnson.) (Ms. Deakins knew about Ms. Wilson's complaints early in the game. Ms. Gillette knew about the complaints not later than November 5, 2014. See, attached letter of November 5, 2014.) In legal parlance, this suggests a "cat's paw" situation, whereby a biased employee infects the decision-making process of the organization and that biased employee's animus is imputed to the ultimate decision-maker. See, e.g., *Bahar v. City of Youngstown*, 7th Dist. Mahoning No. 09 MA 55, 2011-Ohio-1000, par. 71. Also, I find Ms. Deakins' Declaration, dated September 24, to be interesting. In paragraph four she states: "All of the positions in my department were reviewed, including the position held by Complainant Camille Wilson ("Wilson"). During the August 2014 review process it was determined that the duties of Wilson's position no longer warranted continuing this role in the department." Whoever prepared the document wrote it in the passive voice. Ms. Deakins did not state "I, and two other employees, conducted the review." Rather, she states "[P]ositions in my department were reviewed..." and "[I]t was determined..." In other words, Ms. Deakins did not want the Commission to know that she was part of the review team. Evidently she did not know that Mr. Campbell had previously informed Mr. Church of the panel's makeup. Perhaps Ms. Deakins' reticence speaks volumes.

Second, the Commission should review the letter that I submitted in Ms. Wilson's other case. In that letter I demonstrated that UH retaliated when it required Ms. Wilson to undergo a medical exam. Therefore UH has a pattern of retaliation against Ms. Wilson: first with the exam, and second with the termination.

Third, as I mentioned in my letter of October 2, UH first told Ms. Wilson that she could apply for other jobs at UH but later (approximately January 21) Andrea Shadd of the HR office told her that she was on the do not re-

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613

this information concerning the RIF.

1. Define the roles of the three persons panel.

2. Describe the decision making process.

For example, did the panel's decision have to be unanimous? Majority vote? Could the senior member of the panel (Ms. DePompei) make a unilateral decision and override the positions of the two junior members?

Thanks you.

Regards,

Camille Wilson

(216) 965-5570

From the law offices of Vorys, Sater, Seymour and Pease LLP.

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Subject: RE: RIF--Roles of the three panel's person and describe the decision-making process.

From: Campbell, David A. (DACampbell@vorys.com)

To: mscwilson1@yahoo.com;

Cc: DACampbell@vorys.com; lhollingsworth@vorys.com;

Date: Wednesday, February 17, 2016 10:13 AM

Needless to say, we are quite disappointed that you ignored Liana's letters and filed your own case management report. If you are not going to work with counsel as required, we will have to raise the issue with the Court.

As to this email, the Judge asked us to look into the Adriane Shadd allegation that you made during the last conference call. As I informed you over the weekend, Ms. Shadd strongly denies your allegations. Ms. Shadd kept a record of all of her discussions during the time you were RIF'd. She has no record of a conversation with you. She confirmed, despite your claim to the Judge, that you were eligible for rehire. However, you only applied for three jobs after the RIF. One of the positions had qualifications that you did not meet. The other two positions had so many candidates that the postings were closed prior to your applications.

You apparently realized that your Shadd allegations were false and decided to change gears with this email. The OCRC received the RIF information through various declarations. These declarations were provided during the investigation and during the reconsideration phases. We checked on your "three persons panel" and have no record of any such panel. What do you mean.

Thanks.

From: camille wilson [mailto:mscwilson1@yahoo.com]

Sent: Sunday, February 14, 2016 3:28 PM

To: Campbell, David A.

Subject: RIF--Roles of the three panel's person and describe the decision-making process.

Attorney Campbell,

Honorable Judge Dan Aaron Polster asked, that all the RIF information be given to me during our phone conference. I searched through the documents from the OCRC and could not locate the answers to specific question(s) concerning the RIF. Could you please make sure I receive

Subject: Re: Camille Wilson v. University Hospitals Case Medical Center
From: camille wilson (mscwilson1@yahoo.com)
To: DACampbell@vorys.com;
Date: Thursday, February 18, 2016 8:53 PM

ok

On Thursday, February 18, 2016 7:55 PM, "Campbell, David A." <DACampbell@vorys.com> wrote:

----- Forwarded Message -----

Tomorrow should work. Liana, see below. Thanks.

Sent with Good (www.good.com)

From: camille wilson
Sent: Thursday, February 18, 2016 7:14:23 PM
To: Campbell, David A.
Subject: Fw: Camille Wilson v. University Hospitals Case Medical Center

On Thursday, February 18, 2016 6:46 PM, camille wilson <mscwilson1@yahoo.com> wrote:

Attorney Campbell,

I have not received any letter or any other notice from your office beside this email. However, I did prematurely file with the courts a case management plan on Tuesday February 16, 2016 and was advised to contact you concerning filling the documents out together then afterwards we were to file the documents with the courts by February 24, 2016. I could be available Friday February 19th at 2:00pm during my lunch which is thirty minutes. I apologize for not reaching out to you on Tuesday after leaving the courthouse. I had a family member pass and the services was on that same day. Please let me know if we could still meet tomorrow or your next available times. Please feel free to contact me by phone as well (216) 965-5570.

Camille Wilson

On Wednesday, February 17, 2016 2:29 PM, "Popson, Annette M." <ampopson@vorys.com> wrote:

SENT ON BEHALF OF LIANA R. HOLLINGSWORTH:

Please see the attached cover letter and documents that were filed with the court today.

[Vorys, Sater, Seymour and Pease LLP]

Annette M. Popson
Legal Secretary to Liana R. Hollingsworth

Vorys, Sater, Seymour and Pease LLP
200 Public Square, Suite 1400
Cleveland, OH 44114

Direct: 216.479.6164
Fax: 216.479.6060
Email: ampopson@vorys.com
[www.vorys.com<http://www.vorys.com/>](http://www.vorys.com/)

From the law offices of Vorys, Sater, Seymour and Pease LLP.

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From the law offices of Vorys, Sater, Seymour and Pease LLP.

Subject: RE: Requested UH RIF information via Honorable Judge Dan Aaron Polster Court Order
From: Campbell, David A. (DACampbell@vorys.com)
To: mscwilson1@yahoo.com;
Cc: lrhollingsworth@vorys.com;
Date: Tuesday, February 23, 2016 5:52 PM

I will add though that although we are voluntarily giving you some information, the Judge did not order this information production at this time and we are under no obligation to provide this voluntary production. Thanks.

From: Campbell, David A.
Sent: Tuesday, February 23, 2016 5:51 PM
To: camille wilson
Cc: Campbell, David A.; Hollingsworth, Liana R.
Subject: RE: Requested UH RIF information via Honorable Judge Dan Aaron Polster Court Order

I am actually pulling together the information and will email it tomorrow. Thanks.

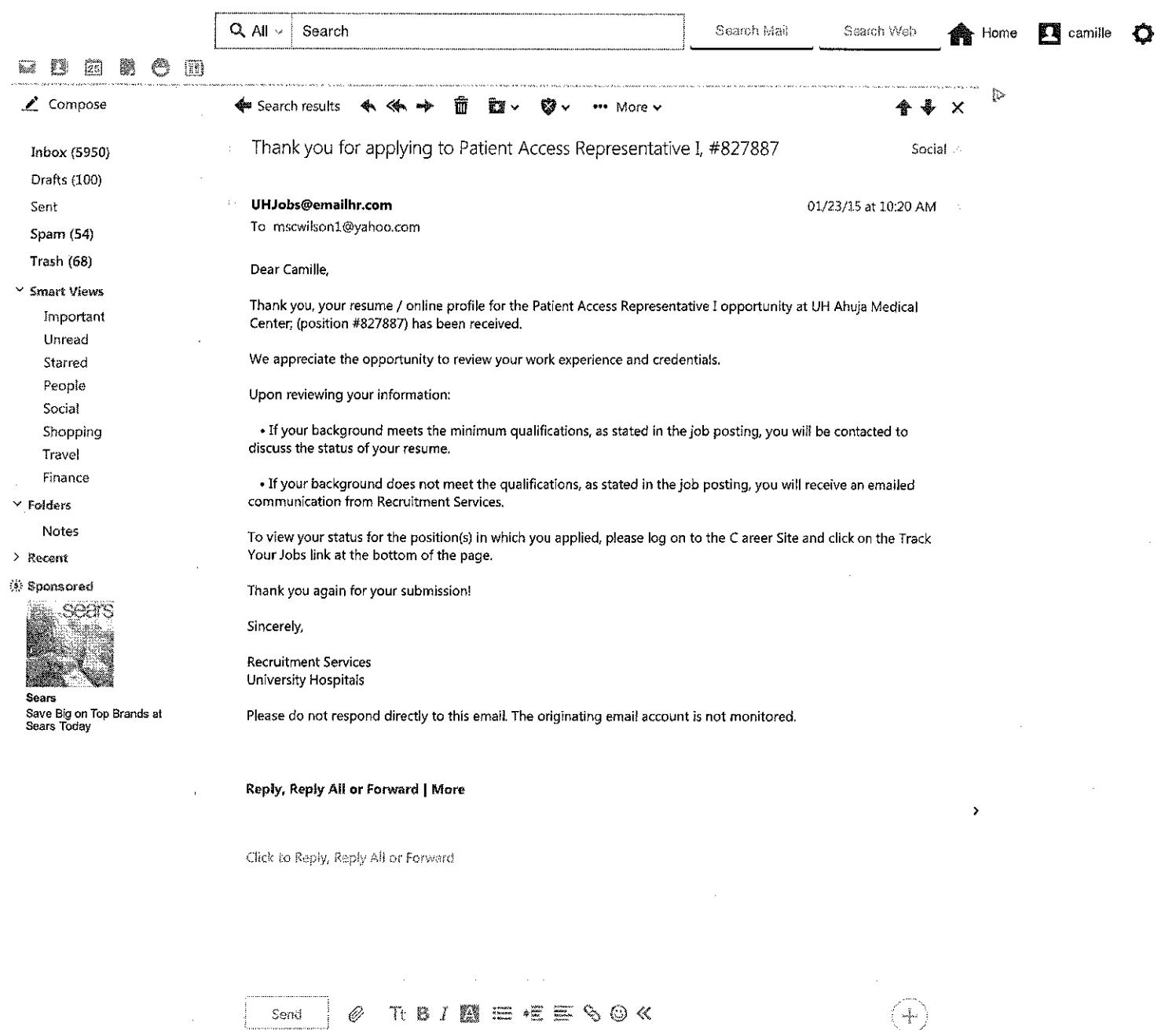
From: camille wilson [<mailto:mscwilson1@yahoo.com>]
Sent: Tuesday, February 23, 2016 5:28 PM
To: Campbell, David A.
Subject: Requested UH RIF information via Honorable Judge Dan Aaron Polster Court Order

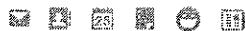
Needless to say, you have not given me the UH RIF information I requested and therefore, I must raise this issue with the Honorable Judge Dan Aaron Polster as not being complied to his Court Order. If you needed more time please let the Honorable Judge Dan Aaron Polster and I know? That way we can know what not to expect from you.

Respectfully,

Camille Wilson

216 965-5570



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01/26/15 at 8:43 AM

To Camille Wilson

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Dear Camille,

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Thank you for your interest in the Patient Access Representative I opportunity at UH Ahuja Medical Center; job number 827887 for University Hospitals. Although we appreciate your interest, we would like to inform you that we've decided to pursue other candidates for this position. Please continue to review the Career Center on our website, <http://www.uhhospitals.org/jobs>, for other positions of interest. We also encourage you to enable the Job Agent function on our website. This will allow you to receive emails as soon as positions that match your area(s) of interest become available.

Please note that if you have applied to other positions / job numbers from the specific one noted above, you may view your status at anytime by logging onto our website, as there could be other opportunities in which you are being considered.

Thank you again for your interest and we wish you success in your career endeavors.

Sincerely,

University Hospitals Recruitment

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UHJobs@emailhr.com

To mscwilson1@yahoo.com

01/23/15 at 10:18 AM

Dear Camille,

Thank you, your resume / online profile for the Corporate Health Clerk opportunity at UH Case Medical Center; (position #874494) has been received.

We appreciate the opportunity to review your work experience and credentials.

Upon reviewing your information:

- If your background meets the minimum qualifications, as stated in the job posting, you will be contacted to discuss the status of your resume.

- If your background does not meet the qualifications, as stated in the job posting, you will receive an emailed communication from Recruitment Services.

To view your status for the position(s) in which you applied, please log on to the Career Site and click on the Track Your Jobs link at the bottom of the page.

Thank you again for your submission!

Sincerely,

Recruitment Services
University Hospitals

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UHJobs@emailhr.com

02/03/15 at 2:26 PM ★

To Camille Wilson

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Dear Camille,

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Thank you for your interest in the Corporate Health Clerk opportunity at UH Case Medical Center; job number 874494 for University Hospitals. Although we appreciate your interest, we would like to inform you that we've decided to pursue other candidates for this position. Please continue to review the Career Center on our website, <http://www.uhhospitals.org/jobs>, for other positions of interest. We also encourage you to enable the Job Agent function on our website. This will allow you to receive emails as soon as positions that match your area(s) of interest become available.

Please note that if you have applied to other positions / job numbers from the specific one noted above, you may view your status at anytime by logging onto our website, as there could be other opportunities in which you are being considered.

Thank you again for your interest and we wish you success in your career endeavors.

Sincerely,

University Hospitals Recruitment

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Thank you for applying to Financial Counselor, #874285

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UHJobs@emailhr.com

To: mscwilson1@yahoo.com

01/23/15 at 10:24 AM

Dear Camille,

Thank you, your resume / online profile for the Financial Counselor opportunity at University Hospitals; (position #874285) has been received.

We appreciate the opportunity to review your work experience and credentials.

Upon reviewing your information:

- If your background meets the minimum qualifications, as stated in the job posting, you will be contacted to discuss the status of your resume.

- If your background does not meet the qualifications, as stated in the job posting, you will receive an emailed communication from Recruitment Services.

To view your status for the position(s) in which you applied, please log on to the Career Site and click on the Track Your Jobs link at the bottom of the page.

Thank you again for your submission!

Sincerely,

Recruitment Services
University Hospitals

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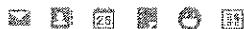
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Job Submission Update: Financial Counselor, #874285

Social

UHJobs@emailhr.com

To Camille Wilson

01/27/15 at 2:55 PM

Dear Camille,

Thank you for your interest in the Financial Counselor opportunity at University Hospitals; job number 874285. We have reviewed your resume and qualifications for this specific position / job number. While your background could be a fit for another opportunity at University Hospitals, we have decided to pursue other candidates that more closely meet our documented qualifications for this particular position.

We appreciate your interest in our organization and encourage you to continue to review the Career Center at <http://www.uhhospitals.org/jobs>, for other positions of interest. We also encourage you to enable the Job Agent function on our website. This will allow you to receive emails as soon as positions that match your area(s) of interest become available.

Please note that if you have applied to other positions / job numbers from the specific one noted above, you may view your status of those opportunities at anytime by logging on to our Career Center webpage, as there could be other opportunities in which you are being considered.

Thank you again for your interest and we wish you success in your career endeavors.

Sincerely,

University Hospitals Recruitment

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Thank you for applying to Corporate Health Clerk, #874494

UHJobs@emailhr.com To mscwilson1@yahoo.com 01/23/15 at 10:18 AM

Dear Camille,

Thank you, your resume / online profile for the Corporate Health Clerk opportunity at UH Case Medical Center; (position #874494) has been received.

We appreciate the opportunity to review your work experience and credentials.

Upon reviewing your information:

- If your background meets the minimum qualifications, as stated in the job posting, you will be contacted to discuss the status of your resume.
- If your background does not meet the qualifications, as stated in the job posting, you will receive an emailed communication from Recruitment Services.

To view your status for the position(s) in which you applied, please log on to the Career Site and click on the Track Your Jobs link at the bottom of the page.

Thank you again for your submission!

Sincerely,

Recruitment Services
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